

**REMARKS**

Claims 1-32 are pending in the present application. Claims 1-3, 5, 8, 11-18, 21, 22, 24, 26, 27 and 29 have been amended, and Claim 32 has been added, herewith. Reconsideration of the claims is respectfully requested.

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

**I. Objection to Specification**

The Examiner objected to the Specification, requiring correction of the Abstract. Applicants have amended the Specification herewith in accordance with the Examiner's guidance as to the proper form of the Abstract. Thus, this objection to the Specification has been overcome.

**II. Objection to Claims**

The Examiner objected to Claims 11 and 16 due to various informalities which Applicants have addressed via amendments to such claims herein. Therefore, the objection of the claims has been overcome.

**III. 35 U.S.C. § 112, Second Paragraph**

The Examiner rejected Claims 12, 16, 17 and 29 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. This rejection is respectfully traversed.

Applicants have amended such claims to address the Examiner's comments regarding such claims. Therefore the rejection of Claims 12, 16, 17 and 29 under 35 U.S.C. § 112, second paragraph has been overcome.

**IV. 35 U.S.C. § 103, Obviousness**

A. The Examiner rejected Claims 1-16, 18-26 and 28-31 under 35 U.S.C. § 103 as being unpatentable over Nagai (Pat. # 6,138,072) in view of "Laura Lemay's Web

Workshop Creating Commercial Web Pages”, Lemay et al. pp. 73-75. This rejection is respectfully traversed.

The present invention relates to a system and method for searching, accessing, retrieving, representing and browsing geographic or location related information from the Web, without intervention of special (proprietary) geographic information systems (GIS) providers. The system described on the present patent application is not limited at all to search a specific type of information from databases of a specific information supplier, but rather it describes a system and method that enables the user to access many locations (i.e., geographic coordinates referenced information) of many types (e.g., restaurants, hotels, hospitals, monuments, etc.) all around the world, and accessing this information from a plurality of servers on the Web.

The differences of the system and method disclosed in the present invention with the cited art, including the reference cited by the examiner (US patent 6,138,072, entitled “Navigation Device”, by Nagai) are clearly stated by the objects of the present invention, in particular by the following objects :

It is a further object of the present invention to provide Internet users with automatically created and updated maps showing the geographic distribution of any place with any type of resources that could be referenced throughout the Web.

It is a further object of the present invention to allow Internet users to browse information, select, locate, navigate and reach places in the world without accessing specific geographic information providers or geographic information systems.

It is a further object of the present invention to create dynamic maps not from one of a few of sources but from the information of the millions of sources, in particular from the URLs on the Web.

It is still another object of the present invention to selectively, interactively and automatically overlay conventional digital maps with an updated distribution of locations of the type the user is searching, thus

avoiding an overload of conventional maps with excess of irrelevant or outdated information.

Differently from the cited art, (including the reference cited by the examiner, US patent 6,138,072, entitled "Navigation Device", by Nagai) the present invention enables use of standard web search tools (web crawlers) such as Google or Yahoo, for doing "geographic queries". In other words, using those standard Web search tools to provide a mechanism to search all of the Web for the location and the related information of resources or services simply by specifying the type of resource or service requested (e.g., restaurant) and the geographic area on which the resource or service is requested.

The present invention enables the user to locate, retrieve, represent and browse from the Web a geographic distribution of places where user selectable types of resources are located or certain types of services are provided (e.g., hospitals, bus terminals, historical places, oil-posts, restaurants, hotels, etc. ....). For each resource located, retrieved and represented, the invention enables a user, by selecting it, to receive the related information (i.e.: an HTML document that describe information about the service provided on the selected physical place).

Differently from the cited art (including US patent 6,138,072, by Nagai), unique, distinctive features of the present invention enable a user:

1. To ask for the locations of generic types of resources (e.g., ask for the locations of hospitals, or bus terminals, or historical places, or oil-posts, or restaurants, or hotels, etc. ....) that could be located inside a region (of a selected size among a plurality of selectable sizes) around any reference point of the world specified by the user (e.g., around the actual position of the user as provided by a GPS receiver carried by the user, or any other position of the world, specified by coordinates manually entered by the user on a user device). In contrast to the teachings of US patent 6,138,072, this search is performed without requiring digital maps and without requesting services of specialized geographic information systems (GIS) or geographic information providers, but simply and directly by means of a standard Web search tool, such as Google or Yahoo.

2. To receive from the Web (not from specialized geographic information systems or geographic information providers as in US patent 6,138,072), the collection of coordinates and URLs corresponding to all resources of the type specified by the user (e.g., the locations of all hospitals and the corresponding URLs of the web pages of those hospitals) located inside the specified region, and map on a user device corresponding icons representing the geographic distribution of those resources (e.g., the location of

hospitals) located inside the region specified by the user (e.g., around the present position of the user).

3. By selecting using a user device any one of the automatically mapped locations (e.g., clicking over the icon of a given hospital), accessing and browsing the information retrieved from the World Wide Web for this location (e.g., the information on the Web page of the selected hospital), *without any resort to services of specialized geographic information systems or geographic information providers* (as required in US patent 6,138,072).

In order to fulfill the purpose of enabling Internet search tools (Web crawlers) to search for geographic (i.e., cartographically tagged) documents on the Web, the present invention is based on the following basic principles:

i) To devise a form of encoding the cartographic coordinates (i.e., the longitude and the latitude) of a point on the world in such a form that the search performed by any Internet search tool to find and to check for geographic coordinates describing a point (or even a region) on the millions of documents on the Web could be performed by using the same highly efficient database alphabetic search mechanisms today used by web search tools to search for certain words specified in an alphabetic query.

ii) A key in understanding the present invention is that most of today's Internet search tools or Web crawlers (e.g., Netscape, Yahoo, Altavista, Excite, Infoseek, Lycos, etc.) are very efficient at serving alphabetic queries (even "fuzzy" alphabetic queries using the wild card "\*"), but those search tools are not able to perform complex queries involving arithmetical computations to search for documents that contain numerical information.

By example, if we perform the following query to Yahoo:

**Search the Web: +natural +science**

we get say 514 titles of documents that contain the full words **natural** and **science**.

But, if we relax our search and we perform the following "fuzzy" query to Yahoo:

**Search the Web: +natur\* +scien\***

we would get 1467 titles of documents that contain the "prefix words": **natur\*** and **scien\***.

Based on this observation, a fundamental concept of the present invention is the disclosed method of encoding (on the documents placed on Web servers) the coordinates of any location referenced on said documents, by:

- Using a universal (reserved) prefix for longitude and latitude names (like GURLX and GURLY) of the referenced location on the same document (e.g. on the same HTML page)

- Using an absolute referential system for encoding coordinates such that, on this system, the coordinates of any point of the world become encoded simply by two natural (positive) numbers (by means of the disclosed "Absolute Geographic Coordinates").

- Using the same metrics units (i.e., meters) to encode the coordinates of any point in the world that are commonly used to measure distances or sizes of geographic areas. This makes easy for people to specify the region of a geographic search in a number of meters around a point, without needing to convert those meters to say, seconds of arc.

- Replacing several of the less significant figures of an absolute geographic coordinate by a single wild card ("\*") to instruct the search tool to find referenced locations inside rectangular regions of different sizes.

This system of encoding geographic coordinates is described in the present application (see, for example, the section entitled "Absolute Geographic Coordinates"), with an illustrative example. Also, in the sections entitled "Web Clients", "Fuzzy Geographic Coordinates" and "Geographic Fuzzy Query", there is described how to ask for:

All restaurants located 1 Km around the geographic coordinates:

**Latitude: 42° 35' 37" N; Longitude: 3° 70' 59" W**

for which the computed associated AGCs are:

**Y = 05267376 m; X = 00342161 m**

may be performed in the present system by doing, by example by means of Yahoo, the following query:

**Search the Web: +GURLX05267\* +GURLY00342\* +RESTAURANT**

This simple query shows how, without requiring from the part of the Yahoo search engine to perform special computations (i.e. mathematical operations) or to look into specially built directories or indexes of "geographic" information, the query will be served exactly in the form of an alphabetic query, and all documents in the Web that contain the word RESTAURANT (or other similar chosen descriptor) and that reference any "gURL" in the range:

**GURLY05267000 <= Y <= GURLY05267999**

**GURLX00342 <= X <= GURLX00342999**

will be found, and will be retrieved from the Web.

It should be observed that geographic queries to the Web with the method of the present invention can combine, in the same query, rather different topics (i.e.: ITALIAN, CHINESE RESTAURANTS, MUSEUMS, ENVIRONMENTAL). Selected topics can be any combination of the many thousands of types of sites that can be associated with a geographic location (i.e.: a place, a building) and that can be referenced by geographic coordinates on any of the millions of documents of the Web.

**A COMPARISON OF THE PRESENT INVENTION WITH NAGAI'S PATENT**

Among others, fundamental differences between the present invention and Nagai's patent are:

1) Differently from Nagai, the presently claimed system does not impose any dependence on any specific mapping system (or collection of maps) on the user device. This fundamental limitation of Nagai patent is clear from the following comment (Col. 4, lines 6-10):

"The above-mentioned system proposed by the present invention enables the user by a simple operation to easily obtain guide information on any one of the objects existing on a map shown on the display screen by accessing specified home pages established in the Internet".

Thus, the Nagai system is intended to work in such a way as to provide the user information related with objects already represented on a map. This is different from the presently claimed system, which enables a user to retrieve, represent over a map, and get information related with of all types of objects, locations or services, even when they are not already represented on a map.

2) A fundamental limitation of Nagai's system is that, to keep timely updated the information of the objects represented on a map, new updated URLs related with those objects must be continuously requested by the service provider from location owners to be stored into the corresponding tables (Figures 6 and 7) on the proprietary "base station" (14). In fact, as stated at Col. 4, lines 16-20 of Nagai:

"It is also possible to always obtain fresh (timely updated) information on objects shown on the map from respective home pages provided for the objects. The scope of available guide information on objects can also be expanded by simply writing URLs of new home pages into the memory 15 of the base station".

This limitation does not exist on the present invention. Since the search for locations of resources or services and the related URLs is performed by means of standard search tools (Google, Yahoo) directly on the Web, there is not any need to keep updated tables of "objects" stored on a centralized "base station". It is transparent to the fact that web pages are constantly being changed, relocated or deleted on all servers on the Web.

These limitations (need of base stations, proprietary mapping systems, need to keep updated tables of objects and URL on base stations) of the Nagai are not solved by the modified system proposed by Nagai (Col. 4, lines 22-4), where it states:

"The memory 15 of the base station 14 has memory spaces corresponding to areas' numbers of the road map and stores in each space records of home-page URLs corresponding to respective objects existing in the same

area-map number. When the navigation device 1 informs the base station of only the current area-map number shown on the display screen, the base station 14 reads all URLs of home pages corresponding to the objects shown on the current area-map from the corresponding space of the memory 15 and transmits all the read-out URLs to the navigation device 1. This method is effective in particular when a map shown on the display screen concerns a relatively small area with the limited number of home pages established in the area. The area-map numbers are contained in the digital map data to be displayed on the display screen. The control processing unit 5 reads the digital map data to find the current map number shown on the display screen."

Observe how in this alternative embodiment of Nagai, maps on the user device remain related (by "area numbers") with tables stored on base stations. Looking at the table on Figure 7 of Nagai, consider the enormous burden for creating and keeping updated on a "base station" the "data tables" of mapped objects and the corresponding URLs to cover a large "area" (e.g., a country) with cells indexed by "area numbers". On the Nagai system, data items like "map numbers", "map objects", "areas", "area-map numbers", "data tables" are all proprietary, and must be created and must be also be repeatedly updated by the service provider (see Figures 6 and 7 of Nagai) to be useful.

3) Another fundamental drawback of Nagai system is the need to install and deploy a proprietary "base station" (proxy server) to provide the services intended by the invention. On Col. 4, lines 40-49 of Nagai, it states:

"The base station 14 can be commonly used by a plurality of vehicles that are each provided with the navigation device according to the present invention. The base station may be installed at multiple places, one in each of respective areas so that each vehicle with the navigation device can communicate with a base station existing in a specified area where the vehicle is traveling. It is also possible for the vehicle to communicate with



one of several base stations that provide different specific home-page URLs”.

Quite differently, the present invention doesn't need to access proprietary proxies or “base stations”. To get the services provided by the present invention, all the user needs is a standard Internet connection and a browser program provided with a standard web search tool, such as Google or Yahoo.

4) Nagai's system not only has the drawback of requiring the user device to communicate with a proprietary “base station” (a proprietary proxy server), but also suffers from a limitation that requires to use a proprietary mapping system on the user's device. As stated by Nagai at Col. 3, lines 36-42:

“When the user locates cursor C on a desired object (e.g., company X) on the road map and then presses the setting switch SW, the control processing unit reads data of the object (company X) and causes the transmitter-receiver 13 to transmit to the base station 14 the object data together with the number of the map on which the object is shown”.

Thus, per the teachings of Nagai, there must be a correspondence not only of a map, but also of an “object” represented on the map displayed on the user device (e.g., company X) with the same (corresponding) “object” that must be tabulated in advance (see table on Fig. 6 of Nagai) on a “data table” on the “base station” 14. Also, as stated by Nagai (Col. 3, lines 47-52):

“The object data comprises data of each of respective objects (e.g., company X, restaurant Y, parking lot Z and national road No. 16 and so on) which are stored in the digital map memory and necessarily used for displaying the object on the display screen”.

Thus, it is clear from the above that "object data" (e.g., "company X") of an item represented in the "proprietary" map must be extracted (Figs. 2 and 3) and must be transmitted to the "proprietary base station".

### **CLAIM ANALYSIS**

Turning now to the claims of the present invention, and specifically with respect to Claim 1, such claim recites "A method in a server system for processing documents comprising information related to one or more geographic locations, said method comprising for each document the steps of:

- determining geographic coordinates of the one or more geographic locations described or referenced in the document;
- encoding said geographic coordinates in a geographic address; and
- tagging said document with said geographic address."

The Examiner expressly acknowledges that the cited Nagai reference fails to disclose tagging of a document with a geographic address. However, states the Examiner:

"Lemay teaches the HTML coding of links into a web page to be able to select a web page (page 73, lines 21-32). It would have been obvious to a person of ordinary skill in the art at the time of the invention to have a tag with the geographic coordinate, because Lemay teaches above allowing the coding of a link in a web page, so that users have the ability to navigate quickly to the web page. This provides the benefit of using a more descriptive and exact address of the object's position for the quick retrieval of the web page associated with the object using the link."  
(emphasis added by Applicants)

Applicants show that the link as described by Lemay is a standard HTML hyperlink. These hyperlinks are known to those of ordinary skill in the art to be a text string specifying a logical name, such as that indicated by Lemay as <http://www.8track.com>, of

a web page or resource. It is only a logical name, and does express or convey any type of geographical information. According to The American Heritage® Dictionary of the English Language, Fourth Edition Copyright © 2003 by Houghton Mifflin Company, the term 'geographic' means:

geographic - of or relating to geography

and the term 'geography' means:

geography - the physical characteristics, especially the surface features, of an area.

Thus, the common meaning of the claimed geographic address is an address of or relating to the physical characteristics of an area. In addition, since the claim recites a step of determining geographic coordinates of the one or more geographic locations *described or referenced in the document*, and encoding said geographic coordinates in a geographic address, the claimed geographic address includes encoded geographic coordinates of *one or more geographic locations described or referenced in the document*. It is shown that a link such as <http://www.8track.com> as described in the Lemay reference provides no geographic information whatsoever, including geographic information regarding geographic locations described or referenced in a document. For example, a computer server maintaining web pages for a web site known as <http://www.8track.com> could be located in Russia, China, Japan, Europe, a space shuttle orbiting the earth, or on a land rover on Mars. The link described by Lemay provides no geographic information whatsoever. If the Examiner maintains their position on the teachings of Lemay, Applicants request that the Examiner clearly articulate how a link such as <http://www.8track.com> provides any type of *geographic* information as that term is commonly known in the art.

Applicants further show that the fact that a prior art device could be modified so as to produce the claimed device is not a basis for an obviousness rejection unless the prior art suggested the desirability of such a modification. *In re Gordon*, 733 F.2d 900,

221 USPQ 1125 (Fed. Cir. 1984). There is simply no suggestion in any cited reference of any desire to modify the teachings contained therein to include document tags having a geographical address for geographic locations described or referenced in the document. The only suggestion for such type of geographical tag comes from Applicants' own patent specification, which cannot be used in establishing obviousness<sup>1</sup>. Thus, Applicants further show an improper finding of obviousness with respect to Claim 1.

Applicants initially traverse the rejection of dependent Claims 2-7 for reasons given above regarding Claim 1.

Further with respect to Claim 2, Applicants show that none of the cited references teach or suggest the claimed step of "tagging said document with one or a plurality of geographic attributes related to the geographic location described or referenced in the document". The Examiner expressly acknowledges that the cited Nagai reference fails to disclose such claimed step, but states that Lemay teaches HTML coding of links - basically repeating the identical teaching of Lemay that was used in rejecting Claim 1. Applicants show error in using Lemay's teaching of HTML coding of links as teaching or suggesting *both* (i) tagging said document with said *geographic address*, and (ii) tagging said document with one or a plurality of *geographic attributes* related to the geographic location described or referenced in the document. The Lemay reference does not teach or suggest tagging a document with any type of geographic information, and specifically does not teach or suggest tagging a document with *both* a geographic address *and* geographic attributes, as recited in Claim 2. Thus, Claim 2 is further shown to not be obvious in view of the cited references.

Claim 4 of the present invention refers to the encoding of geographic coordinates on documents that are stored in a server system (accordingly with the method of claims 1 and 2). In contrast, the coordinates cited by the Examiner in relation with the Nagai patent refer to the coordinates of a selected point (i.e., corresponding to a point selected by a user on a map) which are transmitted to the "master station", in order to select the URLs encoded on the corresponding position of a "data table" in which URLs

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<sup>1</sup> It is error to reconstruct the patentee's claimed invention from the prior art by using the patentee's claims as a "blueprint". When prior art references require selective combination to render obvious a subsequent invention, there must be some reason for the combination other than the hindsight obtained from the invention itself. *Interconnect Planning Corp. v. Feil*, 774 F.2d 1132, 227 USPQ 543 (Fed. Cir. 1985).

corresponding to respective positions on a map are recorded on the "master station" (see Figure 7 of Nagai). These Nagai coordinates are not encoded and tagged to a document, as claimed. Thus, Claim 4 is unrelated with the teachings of Nagai's patent, and therefore the rejection of Claim 4 is shown to be in error.

Claim 5 of the present invention refers to encoding geographic coordinates to be included on documents that are stored on a server (accordingly with the method of claims 1 and 4), and specifies encoding geographic coordinates as "absolute geographic" coordinates (with the aim of making it possible to apply the notion of "fuzzy geographic coordinates" described on our patent application to make possible the search of tagged documents by means of web search tools, such as Google, or Yahoo). There is not anything conceptually similar in the teachings of Nagai's patent. As previously stated, the geographic coordinates cited by the Examiner in relation with Nagai's patent refer to the selected point coordinates (i.e., corresponding to a point selected by a user on a map) which are transmitted to the "master station" in order to select the URLs encoded on the corresponding cell of a data table in which URLs corresponding to respective positions on a map are recorded on the "master station" (see Figure 7 of Nagai). Thus, Claim 5 is unrelated with the teachings of Nagai's patent, and therefore the rejection of Claim 5 is shown to be in error.

With respect to Claim 8, Applicants traverse for similar reasons to those given above regarding Claim 1, and show that neither cited reference teaches or suggests a document comprising a tag including a geographic address, said geographic address comprising encoded geographic coordinates of the geographic location described or referenced in the document. Lemay's teaching of a link merely provides a logical name identifier for web content, and provides no type of geographic information, and specifically does not teach or suggest any type of geographic address comprising encoded geographic coordinates of the geographic location described or referenced in the document. To establish *prima facie* obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974) (emphasis added by Applicants). As *all* the claim limitations are not taught or suggested by the cited art, a *prima facie* case of obviousness

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has not been made by the Examiner, and hence the burden has not shifted to Applicants to rebut an obviousness assertion<sup>2</sup>.

Applicants initially traverse the rejection of dependent Claims 9-16, 18-26 and 28-31 for reasons given above regarding Claim 8.

Further with respect to Claim 9, Applicants traverse for similar reasons to those given above with respect to Claim 2, and show that none of the cited references teach or suggest a document having a tag, the tag including both a geographic address as well as attributes related to the geographic location described/referenced in the document. Therefore, Claim 9 is further shown to have been erroneously rejected, as all the claimed features recited therein are not taught or suggested by the cited references.

Further with respect to Claim 11, Applicants traverse for similar reasons to those given above with respect to Claim 4.

Further with respect to Claim 12, Applicants traverse for similar reasons to those given above with respect to Claim 5.

Further with respect to Claim 13 (and dependent Claims 14-20), such claim recites searching on the plurality of server systems for documents tagged with said geographic address, thereby advantageously allowing for searching the web for a geographic address hit. In contrast, the cited reference teaches transmission of coordinates to a single, proprietary server and thus does not provide for universal Web searching. In addition, there is no teaching or suggestion of searching for (a plurality of) documents tagged with the geographic address, as claimed. Nor has the Examiner alleged any such searching for tagged documents, and hence a prima facie case of obviousness has not been made with respect to Claim 13. Therefore, Claim 13 (and dependent Claims 14-20) is further shown to not be obvious in view of the cited references.

Further with respect to Claim 14, such claim recites both (i) specifying a reference point (Claim 13, of which Claim 14 depends upon), and (ii) specifying one or a plurality of geographic attributes. These claimed features advantageously provide for subsequent

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<sup>2</sup> In rejecting claims under 35 U.S.C. Section 103, the examiner bears the initial burden of presenting a prima facie case of obviousness. *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). Only if that burden is met, does the burden of coming forward with evidence or argument shift to the applicant. *Id.*

searching of documents based on both a geographic address and geographic attributes. None of the cited references teach or suggest specificity of both a reference point and geographic attribute, or the resulting advantageous searching ability. In rejecting Claim 14, the Examiner merely alleges that Nagai teaches selection of an object position and selection of a switch. Such allegation does not establish a teaching or suggestion of both (i) specifying a reference point, and (ii) specifying one or a plurality of geographic attributes, as claimed. Thus, the Examiner has failed to establish a prima facie showing of obviousness with respect to Claim 14 and such claim has thus been erroneously rejected.

Further with respect to Claim 15, such claim recites "searching on the plurality of server systems, *for documents tagged with a geographic address corresponding to a geographic location within the geographic area*". This claimed feature advantageously allows for searching within a geographic area. For example, "a fuzzy geographic address", corresponding to a geographic area such as the area of 1x1 Km represented in the preferred embodiment by:

**GURLX00342\* GURLY05267\***

can be used to search by means of a Web search tool, such as Yahoo or Google, for a document tagged with a geographic address located within the 1x1 Km square around this specified "fuzzy geographic address". This search is performed on a plurality of servers, thereby facilitating a fuzzy geographic search across the Web. None of the cited references teach or suggest such fuzzy geographic search capability. Therefore, Claim 15 is shown to be unrelated to the teachings of the cited references.

Further with respect to Claim 21, Applicants show that none of the cited references teach or suggest the claimed step of "retrieving absolute geographic coordinates *from the geographic address tagged on the documents*". As the documents described by the cited references do not teach or suggest any type of geographical information tagged on the documents, as claimed, there is similarly no teaching or suggestion of retrieving information from such (missing) tags. Therefore, Claim 21 (and similarly for dependent Claims 22-26 and 28-31) is further shown to have been

erroneously rejecting as there are further claimed steps not taught or suggested by the cited references.

Further with respect to Claim 22, Applicants show that none of the cited references teach or suggest the claimed step of associating, in a client system table, the network address and retrieved geographic coordinates of each document, which advantageously facilitates use of a dynamic table in the client system. The data tables cited by the Examiner are pre-loaded, and thus static, tables in the master station. Claim 22 is thus further shown to not be obvious in view of the cited references.

Further with respect to Claim 24, such claim has been amended to clarify that it is the geographic information *retrieved from* the document(s) that can be pointed to by the icon. Thus, in response to a search query, retrieved information is displayed for selection by an icon, to thereby facilitate the dynamic display of results from a geographic query which can then be selected or pointed to. The method of Nagai is different in that the user must first identify and point to an object already depicted on a map (i.e. not the result of a search query) in order to make a selection. Thus, Claim 24 is further shown to not be obvious in view of the cited references.

With respect to Claim 26, such claim has been amended to depend upon Claim 22 and thereby provide an advantage of being able to immediately access a document using a network address from a local table in the client system. In contrast, the cited Nagai patent requires a user to identify and point to an object already depicted on a map, then wait to receive the URL from the master station, and then trigger a hyperlink associated with this received URL. Thus, amended Claim 26 is further shown to not be obvious in view of the cited references.

Therefore, the rejection of Claims 1-16, 18-26 and 28-31 under 35 U.S.C. § 103 has been overcome.

**B.** The Examiner rejected Claim 27 under 35 U.S.C. § 103 as being unpatentable over Nagai (Pat. # 6,138,072), and further in view of Brunts et al. (Pat. # 5,774,828). This rejection is initially traversed for similar reasons to those given above regarding Claim 21 (of which Claim 27 depends upon).



Further with respect to Claim 27, it is shown that when the user points to any of the dynamically generated icons, minimal information such as title or name of the geographic location, short description, geographic coordinates (see section entitled "Minimal Information" on the page 29 of our application) can be extracted from summary information of the corresponding web page (HTML document) retrieved from the server systems. The difference between the present invention and the references cited by the Examiner (Nagai/Brunts) consists not in the fact of displaying location related information, but in the fact that in the present invention information to be displayed is dynamically retrieved in a two step fashion. First, documents are identified responsive to a search query, and geographic coordinates for such document are retrieved and mapped. Responsive to pointing to an icon representing a mapped geographic location (the icon thus being dynamically created responsive to the search query), minimum information relating to this geographic location is then retrieved in the second step of the overall retrieval process. None of the cited references, either singularly or in combination, teach such two-step dynamic retrieval of information. It is thus shown that Claim 27 is different, unrelated and independent from the cited references.

Therefore, the rejection of Claim 27 under 35 U.S.C. § 103 has been overcome.

**V. Objection to Claims**

The Examiner stated that Claim 17 was objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. While Applicants graciously acknowledge the allowability of such claim, it is respectfully shown that Claim 17 is allowable in its current form as being ultimately dependent upon Claim 8 (which is shown above to be allowable).

**VI. Newly Added Claim 32**

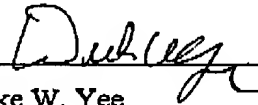
Claim 32 has been added herewith. Examination is respectfully requested.

**VII. Conclusion**

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 5/20

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